STATE OF KANSAS

DEPARTMENT OF HEALTH AND ENVIRONMENT
Forbes Field
Topeka, Kansas 66620-0001
Phone (913) 296-1500

Mike Hayden, *Governor*

Stanley C. Grant, Ph.D., *Secretary*
Gary K. Hulett, Ph.D., *Under Secretary*

~~Source~~ - Tracking noted 2/23/88
↓
Wes

February 15, 1988

Mr. Wes Bartley
RCRA Permit Section
Waste Management Division
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Re: Olin Water Services-Olin Corporation
Kansas City, Kansas
EPA I.D. Number KSD000203638

Dear Mr. Bartley:

Enclosed is a copy of the modified RCRA permit for the storage of hazardous waste at Olin Water Services-Olin Corporation, Kansas City, Kansas. No comments were received during the public comment period from December 18, 1987 to February 1, 1988 nor was a public hearing held. The permit will become effective on February 15, 1988.

Sincerely yours,

Janel J. Rogers
Environmental Engineer
Hazardous Waste Section
Bureau of Waste Management

sc/bartley.jjr

Enclosure

STATE OF KANSAS

DEPARTMENT OF HEALTH AND ENVIRONMENT
DIVISION OF ENVIRONMENT

PERMIT

Hazardous Waste Facility

In accordance with the provisions of Kansas Statutes Annotated 65-3430 et. seq.

PERMISSION IS HEREBY GRANTED

to OLIN WATER SERVICES, OLIN CORPORATION (HEREIN CALLED THE PERMITTEE)

E.P.A. Identification Number KS D000203638

to operate a HAZARDOUS WASTE STORAGE FACILITY

located at KANSAS CITY, KANSAS AT 3155 FIBERGLASS ROAD

in accordance with rules and regulations of the Department of Health and Environment, and the following-named conditions and requirements to wit:

The Permittee must comply with all terms and conditions in Section I through III of this permit. This permit consists of the conditions contained herein, including those in any attachments, the permit application, including all revisions and all applicable hazardous waste regulations contained in K.A.R. 28-31-1 through 28-31-13 in effect on the date of issuance of this permit.

This permit shall become effective at midnight on FEBRUARY 15, 1988 and shall remain in effect until APRIL 7, 1995 unless revoked and reissued, or terminated or continued in accordance with K.A.R. 28-31-9.

Done at Topeka, this 11th day of FEBRUARY 19 88

DEPARTMENT OF HEALTH AND ENVIRONMENT
Forbes Field Topeka, KS 66620-7200
(913) 296-1500

STATE OF KANSAS
DEPARTMENT OF HEALTH AND ENVIRONMENT
DIVISION OF ENVIRONMENT

PERMIT NO. KSD000203638

In accordance with the provision of Kansas Statutes Annotated 65-3430 et seq.

PERMISSION IS HEREBY GRANTED

to Olin Water Services - Olin Corporation, I.D. Number KSD000203638 (herein called the Permittee) to operate a hazardous waste storage facility located in Kansas City, Kansas at 3155 Fiberglass Road, at latitude 39° 08' 47" and longitude 94° 36'58" in accordance with rules and regulations of the Department of Health and Environment, (herein called the Secretary or Department) and the following-named conditions and requirements to wit.

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260 through 264 and 270 and 124 as specified in the permit (Attachment VII). Applicable regulations are those which are in effect on the date of issuance of this permit. (See 40 CFR §270.32(c)).

This permit is based on the assumption that the information submitted in the permit application received on March 14, 1983 as modified by subsequent amendments and letters dated July 18, 1983, April 26, 1984, June 22, 1984, August 7, 1984, September 14, 1984, September 20, 1984, and November 28, 1984, (hereafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 40 CFR §270.41, §270.42 and §270.43) and potential enforcement action. The Permittee must inform the Kansas Department of Health and Environment of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit shall become effective at Midnight on April 6, 1985 and shall remain in effect until April 7, 1995, unless revoked and reissued, or terminated (40 CFR §270.41 and §270.43) or continued in accordance with §270.51(a).

Done at Topeka, this 6th day of March, 1985

Department of Health and Environment

SECTION I

STANDARD CONDITIONS

A. EFFECT OF PERMIT

The Olin Water Services, Olin Corporation, hereafter referred to as the Permittee, is allowed to store hazardous waste in accordance with the conditions of this permit. Any storage of hazardous waste not authorized in this permit is prohibited. Compliance with this permit constitutes compliance, for purposes of enforcement, with K.S.A. 65-3430 et seq. and K.A.R. 28-31-1 through 28-31-13 and Subtitle C of the Resource Conservation and Recovery Act (RCRA). Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9606 (a), commonly known as CERCLA), or any other law providing for protection of public health or the environment.

B. PERMIT ACTIONS (40 CFR 270.30(f))

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR 270.41, 270.42, and 270.43. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

D. DUTIES AND REQUIREMENTS

1. Duty to Comply (40 CFR 270.30(a)) The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance, other than noncompliance authorized by an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application.

2. Duty to Reapply (40 CFR 270.30(b) and 270.10(h)) If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least 180 days before this permit expires, unless permission for a later submission date has been granted.

3. Permit Expiration (40 CFR 270.51) This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 40 CFR 270.13 thru 270.29) and through no fault of the Permittee the Secretary has not issued a new permit as set forth in 40 CFR 270.51.

4. Need to Halt or Reduce Activity Not a Defense (40 CFR 270.30(c)) It shall not be a defense for the Permittee in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

5. Duty to Mitigate (40 CFR 270.30(d)) In the event of noncompliance with the permit, the Permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment.

6. Proper Operation and Maintenance (40 CFR 270.30(e)) The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

7. Duty to Provide Information (40 CFR 270.30(h)) The Permittee shall furnish to the Secretary, within a reasonable time, any relevant information which the Secretary may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Secretary, upon request, copies of records required to be kept by this permit.

8. Inspection and Entry (40 CFR 270.30(i)) The Permittee shall allow the Secretary, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

   (a) Enter at reasonable times upon the Permittee's premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

(d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

9. Monitoring and Records (40 CFR 270.30(j))

(a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261.

Laboratory methods are specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846 (July 1982). These analytical methods or an equivalent may be utilized for monitoring purposes.

(b) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least three years from the date of the sample, measurement, report or record. These periods may be extended by request of the Secretary at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.

(c) Records of monitoring information shall specify:

(i) The dates, exact place, and times of sampling or measurements;

(ii) The individuals who performed the sampling or measurements;

(iii) The dates analyses were performed;

(iv) The individuals who performed the analyses;

(v) The analytical techniques or methods used; and

(vi) The results of such analyses.

10. Reporting Planned Changes (40 CFR 270.30(1)(1)) The Permittee shall give notice to the Secretary as soon as possible of any planned physical alterations or additions to the permitted facility.

    The replacement of worn or broken parts need not be reported as long as replacement is with an equivalent component which does not adversely affect the designed operating procedures or performance of the facility.

11. Anticipated Noncompliance (40 CFR 270.30(1)(2)) The Permittee shall give advance notice to the Secretary of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

12. Transfer of Permits (40 CFR 270.30(1)(3) and 264.12(c) and 270.40)) This permit is not transferrable to any person except after notice to the Secretary. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR 270.41(b)(2) or 270.42(d). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270.

13. Compliance Schedules (40 CFR 270.30(1)(5)) Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

14. Twenty-four Hour Reporting (40 CFR 270.30(1)(6)) The Permittee shall report any noncompliance which may endanger health or the environment orally within 24 hours from the time the Permittee becomes aware of the circumstances, including:

    (a) Information concerning the release of any hazardous waste which may endanger public drinking water supplies.

    (b) Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility.

    (c) The description of the occurrence and its cause shall include:

(i) Name, address, and telephone number of the owner or operator;

(ii) Name, address, and telephone number of the facility;

(iii) Date, time, and type of incident;

(iv) Name and quantity of materials involved;

(v) The extent of injuries, if any;

(vi) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

(vii) Estimated quantity and disposition of recovered material that resulted from the incident.

(d) A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee need not comply with the five day written notice requirement if the Secretary waives the requirement and the Permittee submits a written report within fifteen days of the time the Permittee becomes aware of the circumstances.

15. Other Noncompliance (40 CFR 270.30(1)(10)) The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time monitoring reports, as required by this permit are submitted. The reports shall contain the information listed in the condition "Twenty-four Hour Reporting" of this section.

16. Other Information (40 CFR 270.30(1)(11)) Whenever the Permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Secretary, the Permittee shall promptly submit such facts or information.

17. Other Requirement The Permittee shall defend, indemnify, and hold harmless the State of Kansas, its officers, agents, and employees officially or personnally against all actions, claims, demands whatsoever which may arise from or on account of the issuance of this permit or the construction or maintenance of any facilities hereunder.

E. SIGNATORY REQUIREMENT (40 CFR 270.11)

All reports or other information requested by the Secretary shall be signed and certified as required by 40 CFR 270.11.

F. CONFIDENTIAL INFORMATION (40 CFR 270.12)

The Permittee may claim confidentiality for any information required to be submitted by this permit in accordance with 40 CFR 270.12.

G. DOCUMENTS TO BE MAINTAINED AT FACILITY SITE

The Permittee shall maintain at the facility the following documents and amendments, revisions and modifications to these documents as specified by the regulations cited below:

1. Waste Analysis Plan as required by 40 CFR 264.13 and this permit.

2. Personnel training documents and records as required by 40 CFR 264.16(d) and (e) and this permit.

3. Contingency Plan as required by 40 CFR 264.53(a) and this permit.

4. Closure Plan as required by 40 CFR 264.112(a) and this permit.

5. Cost estimate for facility closure as required by 40 CFR 264.142(d) and this permit.

6. Operating record as required by 40 CFR 264.73 and this permit.

7. Inspection schedules as required by 40 CFR 264.15(b) and this permit.

H. AVAILABILITY, RETENTION AND DISPOSITION OF RECORDS (40 CFR 264.74)

1. The Permittee must furnish all required records, including plans, upon request and will make those records available at all reasonable times for inspection, by any officer, employee or representative of the Department who is duly designated by the Secretary.

2. Unless otherwise specified, all records and/or copies thereof required to be maintained by the terms of this permit will be kept on-site for at least three years.

3. The retention period for all required records is extended automatically during the course of any unresolved enforcement action regarding the facility or as requested by the Secretary.

SECTION II

GENERAL FACILITY CONDITIONS

A. DESIGN AND OPERATION OF FACILITY (40 CFR 264.31)

The Permittee shall design, construct, maintain, and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. This includes adherence to operating conditions and procedures, and emergency shutdown procedures specified in the permit application and in this permit.

B. REQUIRED NOTICE (40 CFR 264.12)

Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, the owner or operator must notify the Secretary and the new owner or operator. He must also notify the new owner or operator in writing of the requirements of Part 264 and Part 270.

C. GENERAL WASTE ANALYSIS (40 CFR 264.13)

The Permittee shall follow the procedures described in the attached Waste Analysis Plan, Attachment I. Waste analysis shall comply with the requirement of 40 CFR 264.13, and 40 CFR 264.17.

D. SECURITY (40 CFR 264.14)

The Permittee shall comply with the security provisions of 40 CFR 264.14(b) and (c).

1. The Permittee must prevent the unknowing entry, and minimize the possibility for the unauthorized entry, of persons or livestock onto the active portions of this facility. An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry through gates or other entrances to the facility must be maintained at all times.

2. In addition, the Permittee must post signs bearing the legend "Danger -Unauthorized Personnel Keep Out," on each side of the hazardous waste storage facility. This legend must be written in English and must be legible from a distance of at least 25 feet.

3. The Permittee will advise the Secretary if unauthorized entry occurred at the facility which caused hazardous waste to be discharged, the nature of problems, if any, that resulted from this occurrence, and corrective action taken by the facility to prevent future happenings. This includes any tampering, destruction or loss at the facility which caused release of hazardous waste.

E. GENERAL INSPECTION REQUIREMENTS (40 CFR 264.15)

1. The Permittee must inspect the facility as per the attached Inspection Schedule, Attachment II, for malfunctions and deterioration, operator errors and discharges which may be causing -or may lead to-(1) release of hazardous waste constituents to the environment, or (2) a threat to human health.

2. The Permittee must follow the attached written schedule for the inspection of monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as sump pumps) that are important to preventing, detecting, or responding to environmental or human health hazards. The Permittee must keep this schedule at the facility.

3. The Permittee must remedy any observed deterioration or malfunction of equipment or structures (such as leaks, cracks, or wall thinning) to ensure that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action must be taken immediately.

4. The Permittee must record inspections in an inspection log or summary. The log or summary shall be kept for at least three years from the date of inspection. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

F. PERSONNEL TRAINING (40 CFR 264.16)

The Permittee shall conduct personnel training as required by 40 CFR 264.16. This training program shall follow the attached outline, Attachment III. Facility personnel must complete the training program within six months after the date of their employment or assignment to the facility, or assignment to a new position at the facility. Personnel must not work in unsupervised positions until they have completed this training program. Facility personnel must take part in an annual review of the required initial training. The training program shall be directed by a person trained in hazardous waste management procedures. The Permittee shall maintain training documents and records as required by 40 CFR 264.16(d) and (e).

G. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE (40 CFR 264.17)

1. The Permittee must take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste must be separated and protected from sources of ignition or reaction including, but not limited to: open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions-sunlight), and radiant heat. While ignitable or reactive waste is being handled, the Permittee will confine smoking and open flame to specially designated locations. "No Smoking" signs will be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

2. The Permittee must take precautions to prevent reactions which:

   (a) Generate extreme heat or pressure, fire or explosions, or violent reactions;

   (b) Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment;

   (c) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;

   (d) Damage the structural integrity of the device or facility;

   (e) Through other like means threaten human health or the environment.

3. The Permittee must document compliance with the requirements of 40 CFR 264.17(a) and (b) as outlined in 40 CFR 264.17(c).

H. LOCATION STANDARDS (40 CFR 264.18)

The facility is considered to be located above the hundred-year floodplain, thus no permit conditions are needed with respect to location standards.

I. PREPAREDNESS AND PREVENTION

1. Required Equipment (40 CFR 264.32) The facility shall be equipped with the following:

   (a) An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel.

   (b) A device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments or State or local emergency response teams.

   (c) Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment.

   (d) Water at adequate volume and pressure to supply water hose streams or foam producing equipment, or automatic sprinklers or water spray systems.

2. Testing and Maintenance and Equipment (40 CFR 264.33) The Permittee shall test and maintain the equipment specified in the permit condition "Required Equipment" as necessary to assure its proper operation in time of emergency.

3. Access to Communications or Alarm System (40 CFR 264.34) The Permittee shall maintain access to the communication or alarm system as required by 40 CFR 264.34.

   (a) Whenever hazardous waste is being poured, mixed, or otherwise handled, the Permittee must ensure that all personnel involved in the operation will have immediate access to an internal alarm or emergency communication device, as described in the Part B permit application either directly or through visual or voice contact with another employee.

   (b) If there is ever just one employee on the premises while the facility is operating, he must have immediate access to a device such as a telephone (immediately available at the scene of operation) or a hand held two-way radio capable of summoning external emergency assistance.

4. Required Aisle Space (40 CFR 264.35) At a minimum, the Permittee shall maintain aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility in an emergency situation. Aisle space shall be maintained as shown in Attachment VI.

5. Arrangements with Local Authorities (40 CFR 264.37)

   (a) The Permittee will attempt to make the following arrangements with local authorities.

      (i) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where facility personnel will normally be working, entrances to and roads inside the facility, and possible evacuation routes;

      (ii) Where more than one police and fire department might respond, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority where there are more than one;

      (iii) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and

      (iv) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

   (b) Where State or local authorities decline to enter into such arrangements, the Permittee must document the refusal in the operating record.

J. CONTINGENCY PLAN

1. Implementation of Plan (40 CFR 264.51) The Permittee shall immediately carry out the provisions of the Contingency Plan, Attachment IV, and follow the emergency procedures decribed by 40 CFR 264.56 whenever there is a fire, explosion, or release of hazardous waste or constituents which threatens or could threaten human health or the environment.

2. Copies of Contingency Plan (40 CFR 264.53) The Permittee must keep a copy of the attached Contingency Plan and all revisions of this plan at the facility and submit the Contingency Plan and all revisions to all local fire departments, police, hospitals, and State and local emergency response teams that may be called to provide emergency services.

3. Amendment of Contingency Plan (40 CFR 264.54)

   (a) The Permittee must review, and immediately amend if necessary, the attached Contingency Plan, whenever:

      (i) the permit is revised;

      (ii) the plan fails in an emergency;

      (iii) the facility changes -- in its design, construction, operation, maintenance, or other circumstances -- in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;

      (iv) the list of emergency coordinators changes; or

      (v) the list of emergency equipment changes; or

      (vi) when any major revision is warranted.

   (b) Amendments to the Contingency Plan are subject to the permit modification requirements of 40 CFR 270.41 and 270.42.

4. Emergency Coordinator (40 CFR 264.55) The Permittee shall comply with the requirements of 40 CFR 264.55, concerning the emergency coordinator. The Permittee will ensure that at all times there will be at least one employee either on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with responsibility for coordinating all emergency response measures. The emergency coordinator must carry out the responsibilities specified in 40 CFR 264.56, and be thoroughly familiar with all aspects of the facility's Contingency Plan, all operations and activities at the facility, and the location layout. In addition, this person must have the authority to commit the resources needed to carry out the attached Contingency Plan.

K. RECORDKEEPING AND REPORTING

1. Operating Record (40 CFR 264.73) The Permittee must keep a written operating record at the facility. The following information must be recorded, as it becomes available, and maintained in the operating record until closure of the facility:

   (a) A description and the quantity of each hazardous waste received, and the method(s) and date(s) of its storage at the facility as required by Appendix I of 40 CFR Part 264.

   (b) The location of each hazardous waste within the facility and the quantity at each location. This information must include cross-references to specific manifest document numbers if the waste was accompanied by a manifest.

   (c) Records and results of waste analyses performed as specified in 40 CFR 264.13 and 264.17.

   (d) Summary reports and details of all incidents that require implementation of the Contingency Plan;

   (e) Records and results of inspections as required by 40 CFR 264.15;

   (f) All closure cost estimates as required by 40 CFR 264.142.

2. Biennial Report (40 CFR 264.75 and 270.30(1)(9)) The Permittee shall comply with biennial report requirements of 40 CFR 264.75 and any other annual reporting requirement of the Secretary.

L. CLOSURE (40 CFR 264, Subpart G)

1. Performance Standard (CFR 264.111) The Permittee shall close the facility as required by 40 CFR 264.111 and in accordance with the Closure Plan, Attachment V.

2. Closure Plan (40 CFR 264.112)

   (a) A copy of the approved Closure Plan and all revision to the Closure Plan must be kept at the facility until closure is completed and certified by the Permittee and by an independent registered professional engineer.

(b) The Closure Plan may be amended at any time during the active life of the facility (the active life of the facility is that period during which wastes are periodically received). The Permittee must amend the plan whenever changes in operating plans or facility design affect the Closure Plan, or whenever there is a change in the expected year of closure. When the Permittee requests a permit modification to authorize a change in operating plans or facility design, he must request a modification of the Closure Plan at the same time. If a permit modification is not needed to authorize the change in operating plans or facility design, the request for modification of the Closure Plan must be made within 60 days after the change in plans or design occurs.

(c) Amendments to the Closure Plan are subject to the permit modification requirements of 40 CFR 270.41 and 270.42.

3. Notification of Closure (40 CFR 264.112(c)) The Permittee shall notify the Secretary at least 180 days prior to the date he expects to begin closure.

4. Time Allowed for Closure (40 CFR 264.113) The Permittee shall treat or remove from the facility site all hazardous wastes within 90 days after receiving the final volume of hazardous wastes and in accordance with the Closure Plan, Attachment V. The Permittee shall complete all closure activities within 180 days after receiving the final volume of hazardous wastes and in accordance with the Closure Plan.

5. Disposal or Decontamination of Equipment (40 CFR 264.114) The Permittee shall decontaminate and/or dispose of all facility equipment as required by 40 CFR 264.114 and the Closure Plan, Attachment V.

6. Certification of Closure (40 CFR 264.115) When closure is completed, the Permittee must submit to the Secretary certification both by the Permittee and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved Closure Plan.

M. COST ESTIMATE FOR FACILITY CLOSURE (40 CFR 264.142)

The Permittee's closure cost estimate, prepared in accordance with 40 CFR 264.142(a), is specified in Attachment V.

1. The Permittee must adjust the closure cost estimate for inflation within 30 days after each anniversary of the date on which the first closure cost estimate was prepared, in the manner required by 40 CFR 264.142(b).

The annual inflation adjustment of the closure cost estimate is not subject to the permit modification requirements of 40 CFR Part 270.

2. The Permittee must revise the closure cost estimate whenever there is a change in the facility's Closure Plan as required by 40 CFR 264.142(c).

   This type of revision is subject to the permit modification requirements of 40 CFR 270.41 and 270.42.

3. The Permittee must keep at the facility the latest adjusted closure cost estimate as required by 40 CFR 264.142(d).

N. FINANCIAL ASSURANCE FOR FACILITY CLOSURE (40 CFR 264.143)

The Permittee must demonstrate continuous compliance with 40 CFR 264.143 by providing documentation of financial assurance, as required by 40 CFR 264.149 and 264.151, in at least the amount of the cost estimates required by permit condition "Cost Estimate for Facility Closure." Changes in financial assurance mechanisms must be approved by the Secretary pursuant to 40 CFR 264.143.

O. LIABILITY REQUIREMENTS (40 CFR 264.147)

The Permittee shall demonstrate continuous compliance with the requirements of 40 CFR 264.147 and the documentation requirements of 40 CFR 264.149 and 264.151, including the requirements to have and maintain liability coverage for sudden accidental occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million, exclusive of legal defense costs.

P. INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS (40 CFR 264.148)

The Permittee shall comply with 40 CFR 264.148 whenever necessary.

SECTION III

STORAGE IN CONTAINERS

A. WASTE IDENTIFICATION

1. The Permittee may store only the following hazardous wastes in containers at the facility, subject to the terms of this permit.

EPA HAZARDOUS WASTE NO.	DESCRIPTION
D001	A solid waste that exhibits the characteristic of ignitability, but is not listed as a hazardous waste in 40 CFR Part 261, Subpart D.
D002	A solid waste that exhibits the characteristic of corrosivity, but is not listed as a hazardous waste in 40 CFR Part 261, Subpart D.
D003	A solid waste that exhibits the characteristic of reactivity, but is not listed as a hazardous waste in 40 CFR Part 261, Subpart D.
D007	A solid waste that exhibits the characteristic of EP Toxicity, if using the test method in 40 CFR Part 261, Appendix II, the extract from a representative sample of the waste contains chromium at a concentration greater than or equal to 5.0 milligrams/liter, and is not listed as a hazardous waste in 40 CFR Part 261 Subpart D.
U031	n-Butyl Alcohol
U070	o-Dichlorobenzene
U133	Hydrazine
U114	Ethylenebis(dithiocarbamic acid) 1,2-Ethanediylbis carbamodithioic acid
U242	Phenol, pentachloro

2. The hazardous wastes identified above shall be stored in a maximum of 200 fifty-five (55) gallon drums meeting the U.S. Department of Transportation specifications. The drums of hazardous waste shall be stored in the hazardous waste storage building or area.

B. CONTAINER STORAGE AND CONTAINMENT SYSTEM

1. Condition of Containers (40 CFR 264.171) If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit.

2. Compatibility of Waste with Containers (40 CFR 264.172) The Permittee must use a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.

3. Management of Containers (40 CFR 264.173) The Permittee must always manage containers such that:

   (a) A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

   (b) A container holding hazardous waste must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.

4. Special Requirements for Ignitable or Reactive Waste (40 CFR 264.176) The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line on the north and east sides of the hazardous waste storage area. The southern and western sides of the hazardous waste storage area are less than 15 meters (50 feet) from the facility's property line.

5. Special Requirements for Incompatible Wastes (40 CFR 264.177) The Permittee shall store incompatible waste in containers in accordance with the following:

   (a) Incompatible wastes, or incompatible wastes and materials must not be placed in the same container, unless 40 CFR 264.17(b) is complied with.

   (b) Hazardous waste must not be placed in an unwashed container that previously held an incompatible waste or material.

(c) A storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device.

6. Inspections (40 CFR 264.174) At least weekly, the Permittee must inspect the hazardous waste storage building looking for leaking containers and for deterioration of containers and the containment system as specified in Attachment II.

7. Containment System (40 CFR 264.175) The Permittee shall construct, operate, and maintain the containment system as specified in the plans, procedures, and schedule in Attachment VI, and in accordance with the following:

(a) The base must be free of cracks or gaps and sufficiently impervious to contain leaks, spills and accumulated precipitation until the collected material is removed.

(b) The containment system must be designed, constructed, and operated to drain and remove liquids resulting from leaks, spills, or precipitation unless the containers are elevated or otherwise protected from contact with accumulated liquids.

(c) The containment system must have sufficient capacity to contain 10 percent of the volume of containers or the volume of the largest container, whichever is greater, plus precipitation. Run-on into the containment system must be prevented.

(d) The collection system must have sufficient excess capacity, in addition to that required in III.B.7.(c) above, to contain any run-on into the containment system, unless run-on into the containment system is somehow prevented.

(e) Spilled or leaked waste and precipitation accumulated in the sump must be pumped into containers in as timely a manner as necessary to prevent overflow of the collection system and contact of containers with accumulated liquid.

(f) Any material removed from the collection system must be sampled and analyzed as either unknown aqueous or unknown non-aqueous liquids in accordance with the Waste Analysis Plan, Attachment I.

8. Schedule of Compliance (40 CFR 270.33) The Permittee shall construct the containment system described in Attachment VI according to the following schedule:

Action Item	Date of Completion (from final permit issuance)
Solicit bids from outside contractors based on specifications of approved design drawings	1 week
Obtain capital funding from Olin Corporate parent	8 weeks
Award Construction Contract	10 weeks
Begin construction	11 weeks
Contact KDHE inspector	16 weeks
Construction complete with waste storage area operational	17 weeks

ATTACHMENTS

NUMBER	DESCRIPTION
Attachment I	Waste Analysis Plan
Attachment II	Inspection Schedule
Attachment III	Personnel Training Program
Attachment IV	Contingency Plan
Attachment V	Closure Plan and Cost Estimate
Attachment VI	Container Storage Area Specifications and Operating Procedures
Attachment VII	RCRA Regulations
Attachment VIII	Federal Register, September 1, 1983

(revised 11/87)

270.14(b)(1): A general description of the facility.

The facility is a hazardous waste drum storage area in a detached building in the production yard of the Olin Water Services Plant. The floor of the building is a reinforced concrete slab surrounded on three sides by concrete block walls and covered by a steel roof with clear panels for lighting. The north side of the building is open and has a six foot wide ramp along the entire length which rises nine inches to the building floor. The building floor is sloped away from the entrance ramp to a sump along the back wall. The drums will be stored on four foot pallets in four rows five pallets deep with aisles on either side of the rows and stacked at a height not to exceed twelve (12) feet. Ignitable and reactive wastes will be stored in the outside rows. Aqueous wastes will be stored in the two middle rows. The total number of drums stored in the facility will not exceed 200-55 gallon drums. A design drawing of the facility is included in Section 270.15(a)(1).

ATTACHMENT II

INSPECTION SCHEDULE

(revised 4/84, 6/84, 9/[illegible]5/87)

270.14(b)(5): A copy of the general inspection schedule required by Section 164.15(b)....

GENERAL INSPECTION SCHEDULE

I. Procedures and Responsibilities

A. General inspection frequency: weekly

B. Individuals authorized to conduct inspection in order of alternate service:

1. Production supervisor.

2. Plant manager.

C. Inspectors to record observations and date/nature of repairs or other remedial actions on "WASTE AREA INSPECTION LOG" (see attachement).

II. Items to be inspected and frequency of inspections

A. Condition of containers: weekly

1. Leaks.

2. Deterioration.

3. Stability of stacking arrangements and condition of pallets.

B. Containment System: daily

1. General condition of containment curbs, floor and sump.

2. Condition of sump pump.

C. Amount of aisle space between containers: weekly

D. Condition of emergency equipment: monthly

1. Fire hoses and fire extinguishers.

2. Siren alarms.

3. Emergency showers and eye wash stations.

4. Scott Air Packs.

5. Liquid vacuum equipment.

III. Items inspected by outside contractors/suppliers and frequency of inspections

A. Fire hoses and fire extinguishers: yearly

B. Sprinkler system: yearly

Attachment: "WASTE AREA INSPECTION LOG" format

IV. Inspection log

A. Information to be included in the inspection record should include date, time of inspection, name of inspector, a notation of observations made, date and nature of any repairs or other remedial actions.

B. This record will be maintained in the Production Supervisor's office and kept for a minimum of three years from the date of the inspection.

V. Handling of deteriorated, damaged, or leaking containers.

A. In the event that a drum is noted during an inspection, or any other time, to be in a deteriorated condition such as to pose a possible health or environmental hazard, the drum is to be moved out of the storage area, the contents are to be repackaged in a suitable container, and the new drum is to be placed in the waste storage area.

B. Spills or leaking containers are to be handled in accordance with the Spill Control Procedure.

Waste Area Inspection Log

EMERGENCY EQUIPMENT _____ INSPECTION FREQUENCY : MONTHLY

MONTH	FIRE HOSES	FIRE EXTIN-GUISHERS	SIREN ALARM	SHOWERS/ EYE WASH	SCOTT AIR PACK	WET/DRY VACUUM	COMMENTS

CONTAINMENT SYSTEM INSPECTION FREQUENCY : DAILY

MONTH:	GENIL AREA	SUMP	SUMP PUMP				COMMENTS:					

CONTAINERS INSPECTION FREQUENCY : WEEKLY

MONTH:	LEAKS	DETERIORATION	STACKING/ PALLETS	AISLE SPACE			COMMENTS:				

OUTSIDE CONTRACTORS

MONTH:	SPRINKLER SYSTEM	RECEIPT	FIRE EXTIN-GUISHER	RECEIPT	COMMENTS:
					ADT - Sprinker System Inspection - once/month EDCOR - Fire Extinguisher Inspection - yearly

ATTACHMENT VI

CONTAINER STORAGE AREA SPECIFICATIONS AND OPERATING PROCEDURES

(revised 11/87)

270.15(a) : A description of the containment system to demonstrate compliance with Section 264.175. Show at least the following:

(1) Basic design parameters, dimensions, and materials of construction. See accompanying design drawing. The facility will be constructed to comply with local building codes. A construction schedule is attached.

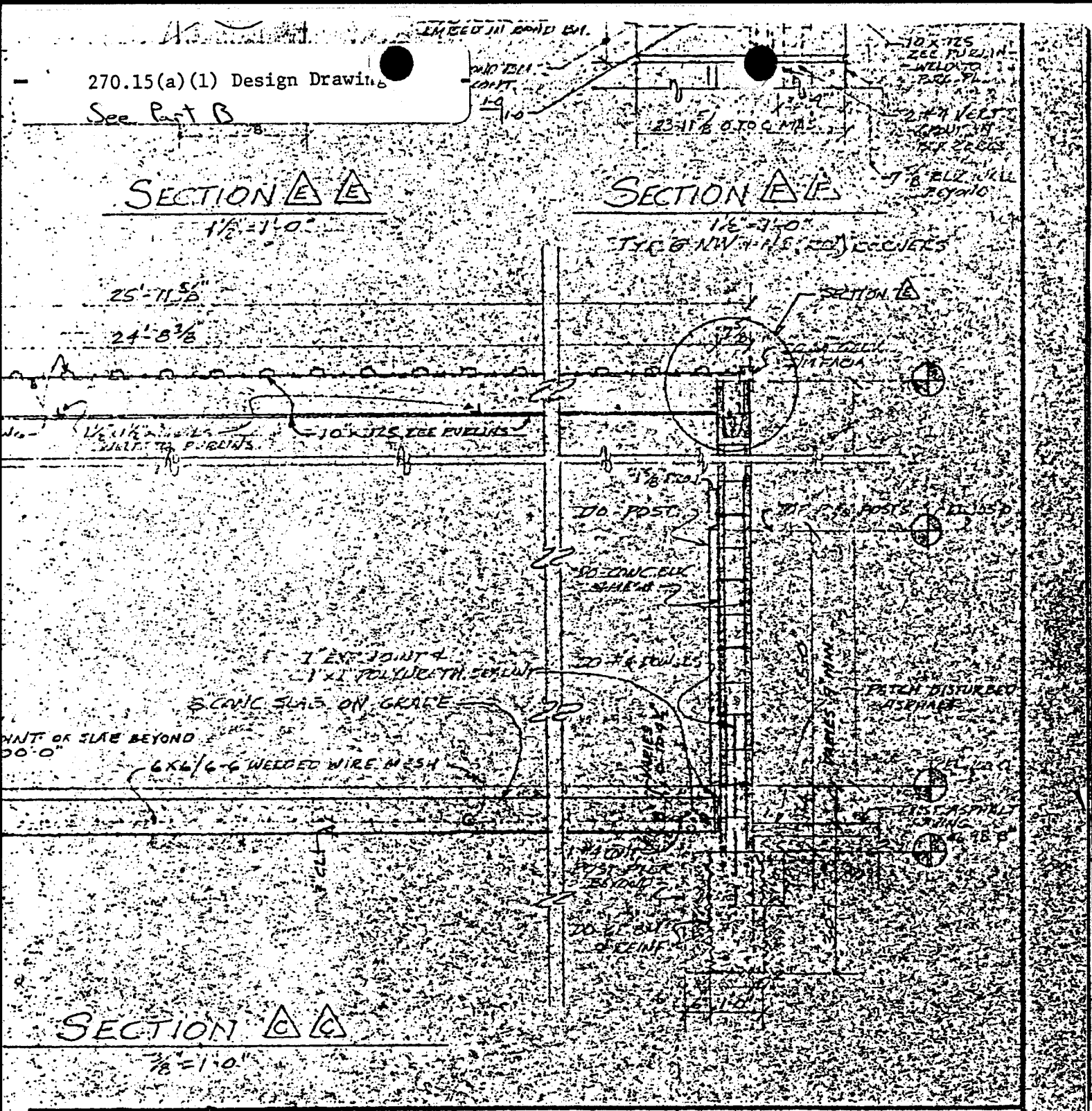
The proposed storage facility is designed to physically and structurally hold an area four pallets wide by five pallets deep (pallets are four feet by four feet). The pallets may be stacked to a height not to exceed twelve (12) feet. The total number of drums stored in the facility will not exceed 200-55 gallon drums.

The overall dimensions of the facility will be about 31 by 26 feet and the area available for storage will be about 25 by 24 feet.

The slab and sump will be constructed of concrete reinforced with carbon steel wire mesh. The sump cover will be a carbon steel grate. The access ramp will be asphalt.

270.15(a)(1) Design Drawings

See Part B



OLIN WATER SERVICES

DIVISION OF OLIN CORPORATION

SCALE: AS INDIC.	APPROVED BY:	DRAWN BY: RFS
DATE: 2/10/83		REVISED 8/9/84 9/6/84

K.C. HAZARDOUS WASTE CONTAINMENT STRUCTURE

3155 FIBERGLAS ROAD, KANSAS CITY, KANSAS

PLANS & SECTIONS

DRAWING NUMBER 1 OF 1

270.15(a)1

Waste Storage Area - Project Construction Schedule

Major milestones for the construction of the Hazardous Waste Containment Area are as follows:

Action Item	Estimated Completion Date (weeks after Part B approval)
1. Solicit bids from outside contractors based on specifications of approved design drawings.	1 week
2. Obtain capital funding from Olin Corporate parent.	8 weeks
3. Award construction contract	10 weeks
4. Begin construction	11 weeks
5. Construction complete with waste storage area operational	17 weeks

PROJECT SCHEDULE SHEET

Covering WASTE STORAGE AREA Status as of 9/13/84
Distribution: EPA REGION VII, KDHE, R. HENDEY, B. MADSEN, L. PROUTY Reported by G. JENKINS

Plant KANSAS CITY Project(s)
By With
Date Sheet 1 of 1

Proj. No. and/or Description / Work to do; Action to take	Resp. of
1. WRITE SPECIFICATIONS	GDJ
2. SOLICIT BIDS	GDJ DAC
3. EVALUATE BIDS	GDJ
4. PREPARE CAPITAL REQUEST	GDJ BMM
5. OBTAIN CAPITAL REQUEST APPROVAL	MGMT
6. ISSUE SERVICE ORDER(S)	GDJ DAC
7. RELOCATE EXISTING WASTE AREA	WED
8. CONSTRUCT WASTE CONTAINMENT	CONTR.
9. STOCK WITH WASTE	WED

WEEKS AFTER PART B APPROVAL: 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21

Further Schedule

Gantt Chart Code: ⌜ Date work scheduled to start ⌝ Date work scheduled to finish ⌜⌝ Total time scheduled for work — Amount of work done
(Each vertical period represents one unit of time. Use Gantt Chart Code or enter numbers and/or other indicators.)

270.15(a) : A description of the containment system to demonstrate compliance with Section 264.175. Show at least the following:

(2) How the design promotes drainage or how containers are kept from contact with standing liquids in the containment system.

The design promotes drainage by sloping the concrete slab away from the access ramp and to the sump. Containers will be protected from standing liquid by the large volume of sump containment available and by being on pallets.

270.15(a): A description of the containment system to demonstrate compliance with Section 264.175. Show at least the following:

(3) Capacity of the containment system relative to the number and volume of containers to be stored.

The capacity of the storage facility is for 11,000 gallons of free liquid. The actual capacity of the containment system is for approximately 2,250 gallons of free liquid, or approximately 20 percent of the storage facility capacity. This containment system capacity is sufficient to provide for collection of 10 percent of the storage facility's free liquid capacity in addition to the blow-in from a nine inch rain.

270.15(a): A description of the containment system to demonstrate compliance with Section 264.175. Show at least the following:

(4) Provisions for preventing or managing run-on.

Run-on is prevented by a continuous ring of protection consisting of three concrete block walls on the south, east, and west sides of the facility and an access ramp up to nine inches on the north side of the facility.

270.15(a): A description of the containment system to demonstrate compliance with Section 264.175. Show at least the following:

(5) How accumulated liquids can be analyzed and removed to prevent overflow:

Should liquid accumulate in the facility's secondary containment system, it will be pumped out to an appropriate container or containers. It will then be analyzed in accordance with the waste analysis plan of Section 270.14(b)(3) of this permit application. If the liquid is determined to be a hazardous waste, it will be managed as such.

The interior slab of the facility is sloped to a trench and sump for storage. Accumulated liquids will be pumped into 55 or 30 gallon container(s) with a portable sump pump. From these container(s) they will be sampled and analyzed as either unknown aqueous or unknown non-aqueous liquids in accordance with the waste analysis plan. The determination of aqueous or non-aqueous character will be based on an assessment of what, if any, component of the accumulated liquid is due to waste container failure.

Each time an accumulation of liquid is removed from the secondary containment structure, a sample will be taken and an analysis will be run. If the hazardous waste analysis described above does not preclude the possibility of discharging the material to the sewer, then it will be analyzed to determine compliance with the sewer discharge parameters and limits in the plant's sewer discharge permit (see Item V of the waste Disposal Record Sheet of the waste analysis plan).

Liquids that meet all sewer discharge limitations may be discharged to the sewer, and liquids that only require pH adjustment to meet all sewer discharge limitations may be discharged to the sewer after the necessary pH adjustment. Such discharge will be by way of pouring or pumping liquids directly from 30 or 55 gallon containers to one of the trench drains inside the plant. If analysis indicates that the liquid exhibits hazardous waste characteristics other than or in addition to corrosivity due to extreme pH, the liquid will be placed into new container(s), if necessary , and stored in the hazardous waste facility prior to shipment to a permitted and approved off-site treatment facility.

270.15(b): For storage areas that store containers holding wastes that do not contain free liquids, a demonstration of compliance with Section 264.175(c),....

SECTION NOT APPLICABLE

270.15 (c): Sketches, drawings, or data demonstrating compliance with Section 264.176 (location or buffer zone and containers holding ignitable or reactive wastes) and Section 264.177(c) (location of incompatible wastes), where applicable.

As indicated in the earlier response to 270.14(b)(2) concerning chemical and physical analyses of hazardous wastes to be handled, certain ignitable or ignitable/reactive wastes may at times be placed into storage in the proposed drum storage facility. However, for reasons that have already been accepted by the Kansas Department of Health and Environment as a sound basis for granting an exemption from 40 CFR 265.176 for the existing hazardous waste storage facility, it is believed that a waiver of 40 CFR 264.176 is appropriate for the proposed hazardous waste storage facility. These reasons were stated in the attached October 27, 1981 correspondence from Mr. Wilbur Bradley of Olin Water Services to Mr. Randy Bradley of the Kansas Department of Health and Environment. The exemption from 40 CFR 265.176 was granted by way of the attached letter dated September 24, 1982 from Vivek Kamath of the Kansas Department of Health and Environment to Mr. Wilbur Bradley. The attached January 6, 1983 letter from Mr. Robert Morby of EPA Region VII to Mr. Mark Pelley of Olin Corporation indicates that EPA will in the course of its evaluation of the Part B permit application consider arguments for relief from 40 CFR 264.176 and that such arguments should address alternatives that could meet the intent of the regulation, problems with meeting the buffer zone requirement, and local fire code requirements. The following discussion addresses these areas of concern.

I. Alternatives that could meet the intent of the buffer zone requirement.

As indicated in the materials provided pursuant to 270.15(a)(2) and (3), preceding, the proposed container storage facility is designed to ensure containment of any foreseeable release of hazardous waste. Locating the proposed facility in the same southwest corner that the existing facility is located in would insure that there would be a distance of approximately 68 feet to the nearest building to the south and a distance of about78 feet to the nearest building to the west. Daily inspections of the drum storage area would detect potential problems relating to container integrity before emergency conditions could develop.

II. Problems with meeting the buffer zone requirement:

In order to provide for adequate isle space between drums in the storage facility, any practical design would have to specify an area measuring at least twenty feet on each side. If such an area were dedicated for waste storage inside the manufacturing building, it would result in potentially unsafe crowding of the workplace and reduced aisle space available to emergency response personnel and equipment in the event of an emergency. If such an area were dedicated for waste storage inside the warehouse building to the east of the manufacturing building, it would likewise create crowding.

Furthermore, it is not clear that Olin could secure permission to store hazardous waste in the warehouse which is owned by another party. If drummed waste were moved as far as possible from the property line without being relocated to within the production or warehouse buildings and without being placed on a parking lot or truck loading/unloading zone, then it would have to be placed up against the exterior south wall of the production building. That wall stands only 68.3 feet from the south property line, so a waste storage area measuring at least twenty feet on a side would still not provide for the 50 foot buffer zone. Furthermore, such an arrangement would create problems with regard to the plant's fire insurance policy.

III. Local fire code requirements

The applicable local fire code is the 1981 National Fire Protection Association's Flammable and Combustible Liquids Code (NFPA 30 - 1981). The facility is designed to comply with this code and will be evaluated against this code during the local building permit process.

Attached is a layout map which shows the distances between the storage area and surrounding buildings, both on-site and off-site. As can be seen from this map, the nearest building is more than 30 feet away from the facility. At storage capacity, fully 60% of the wastes in the facility will be aqueous, and ignitable liquid wastes could constitute no more than 20% of the inventory. The remaining 20% of the waste inventory would be solid wastes, some or all of which could exhibit ignitable or reactive properties. However, these materials would not exhibit volatility and would be buffered from ignitable liquids by three aisles and two rows of aqueous waste materials, each row being one pallet wide (see attached waste segregation diagram). These measures will serve to limit the potential for fire or violent reaction to spread from one area of the facility to another. Furthermore, the actual potential for ignitability, reactivity, and incompatibility of Olin Water Services wastes is inherently low due to the charateristics of the chemicals used in its line of business. For these reasons, Olin Water Services believes that a setback of 30 or more feet provides an appropriate margin of safety to surrounding buildings Our long experience with and extensive knowledge of our materials does not permit us to reasonably foresee any circumstances for which such setback would not assure that a fire or sudden release of energy in the facility would not affect surrounding buildings.

The attached letter from Mr. Fred L. Brown, Assistant Fire Marshal, Kansas City, Kansas Fire Department, documents design requirements for the subject facility imposed by the Fire Department. These requirements are, we believe, exceeded in the facility design provided in this permit application (see Section 270.15(a)(1)).

ATTACHMENTS FOLLOWING:

1) Correspondence dated 10/27/81, W. Bradley to R. Bradley (2 pages);
2) Correspondence dated 9/24/82, V. Kamath to W. Bradley (1 page);
3) Correspondence dated 1/6/83, R. Morby to M. Pelley (1 page);

4) Layout map showing distances between storage area and surrounding buildings;

5) Waste segregation diagram;

6) Correspondence dated 8/7/84, F. Brown to G. Jenkins (1 page).

Olin
WATER SERVICES
81 CORPORATE WOODS, 9393 WEST 110TH STREET, OVERLAND PARK, KANSAS 66210 (913) 642-7100

October 27, 1981

Mr. Randy D. Bradley, Div. of Environment
Hazardous Waste Management Section
Bureau of Environmental Sanitation
Topeka, Kansas

Dear Mr. Bradley,

In response to your letter dated 9/11/81, listing (4) items identified by the U.S. E.P.A. that needed to be corrected to bring us in compliance with RCRA Regulations, the following action has been taken.

1. An inspection schedule consistent with the requirements of Sections 265.15 and 265.174 of the RCRA regulations has been prepared and is available for review, an inspection log has also been prepared.

2. Pursuant to Section 260.20 at the RCRA regulations, we would like to petition for a modification of the requirement in Section 265.176 that containers holding ignitable or reactive waste must be located at least 50 feet from the property line of our plant. We think such a modification would be appropriate at our plant for the following reasons:

   (a) Storage of our containers of ignitable or reactive hazardous waste at least 50 feet from the property line would require that they be inside the production building; this would result in potentially unsafe crowding of the workplace and reduced aisle space available to emergency response personnel and equipment in the event of an emergency.

   (b) Routine inspections of the drum storage area would detect potential problems before the onset of emergency conditions.

   (c) The storage of ignitable or reactive drummed waste near the plant property line is no more dangerous than the storage of ignitable or reactive drummed raw or finished goods near the plant property line.

   (d) If the drummed waste ignitables were moved as far as possible from the property line without being relocated to within the production building, they would still not be 50 feet from the property line, and they would be placed up against the exterior wall of the production building in violation of our property insurance policy.

(e) If drummed waste ignitables had to be stored inside the production building, then other raw materials or finished goods would be displaced to the outside area; such an arrangement would involve substantial operating inefficiency without any clear gain in waste management safety.

3. Aisle space as required in Section 265.35 has been provided.

4. A contingency plan based on Sections 265.51 - 265.54 has been prepared and is available for review, the local fire department has expressly stated that it does not want a copy of any plant's contingency plan as it would be likely to delay and confuse the response to an emergency.

Sincerely,

W. W. Bradley

W. W. Bradley
Plant Manager
Olin Water Services

WWB:je
cc: B. Davidoff
H. Day
R. S. Hendey
B. M. Madsen
J. Sandoval
M. W. Pelley
H. Rubenstein
W. Dame

State of Kansas . . . John Carlin, Governor

DEPARTMENT OF HEALTH AND ENVIRONMENT

Joseph F. Harkins, Secretary

Forbes Field
Topeka Kansas 66620
913-862-9360

September 24, 1982

Mr. W. W. Bradley
Olin Water Services
3155 Fiberglass Road
Kansas City, Kansas 66115

Re: Variance Request No. 82-05

Dear Mr. Bradley:

We have reviewed your letter dated August 31, 1982 and the variance request enclosed with it. Considering the circumstances for which you requested the variance, we are exempting you from 40 CFR 265.176 under the authority received by the State of Kansas for administering the hazardous waste management program for Interim Status facilities. This approval is valid until September 30, 1983, at which time we will review the variance to determine if an extension is necessary.

Please note that this approval will exempt you from storage of containers holding ignitable or reactive wastes within at least 15 meters (50 feet) from your property line.

If you have any questions, please feel free to call me.

Sincerely yours,

DIVISION OF ENVIRONMENT

Vivek Kamath

Vivek Kamath
Hazardous Waste Management Section
Bureau of Environmental Sanitation

VK:cavs
cc: Randy Bradley

RECEIVED
OCT 0 4 1982
B. M. MADSEN

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VII
324 EAST ELEVENTH STREET
KANSAS CITY, MISSOURI - 64106

JAN 06 1983

Mr. Mark Pelley
Olin Corporation
Environmental Affairs Department, 3-F
120 Long Ridge Road
Stamford, Connecticut 06904

EPA I.D. NO.: KSD000203638

Dear Mr. Pelley:

This letter confirms the December 30, 1982, telephone conversation with Karen Flournoy of my staff, and yourself regarding the Olin Water Services facility in Kansas City, Kansas.

We have researched your December 28, 1982, inquiry regarding the Kansas Department of Health and Environment (KDHE) variance from the 40 CFR 265.176 requirement for ignitable waste in containers and the Part B permit application. As Mrs. Flournoy advised you on December 30, we request that the Part B application include a discussion of why the requirement of 265.176 cannot be met and propose alternatives to meet the intent of this regulation. We will review this information during the application review process and determine if we can grant a waiver. It is important that we develop written documentation/justification on this issue. You should also discuss local fire codes with regard to storage of ignitable waste in containers. Any further questions on this issue or the Part B application process can be directed to Mrs. Flournoy at (816) 374-6531.

Sincerely yours,

Robert L. Morby
Chief, Waste Management Branch
Air and Waste Management Division

cc: John Goetz, KDHE

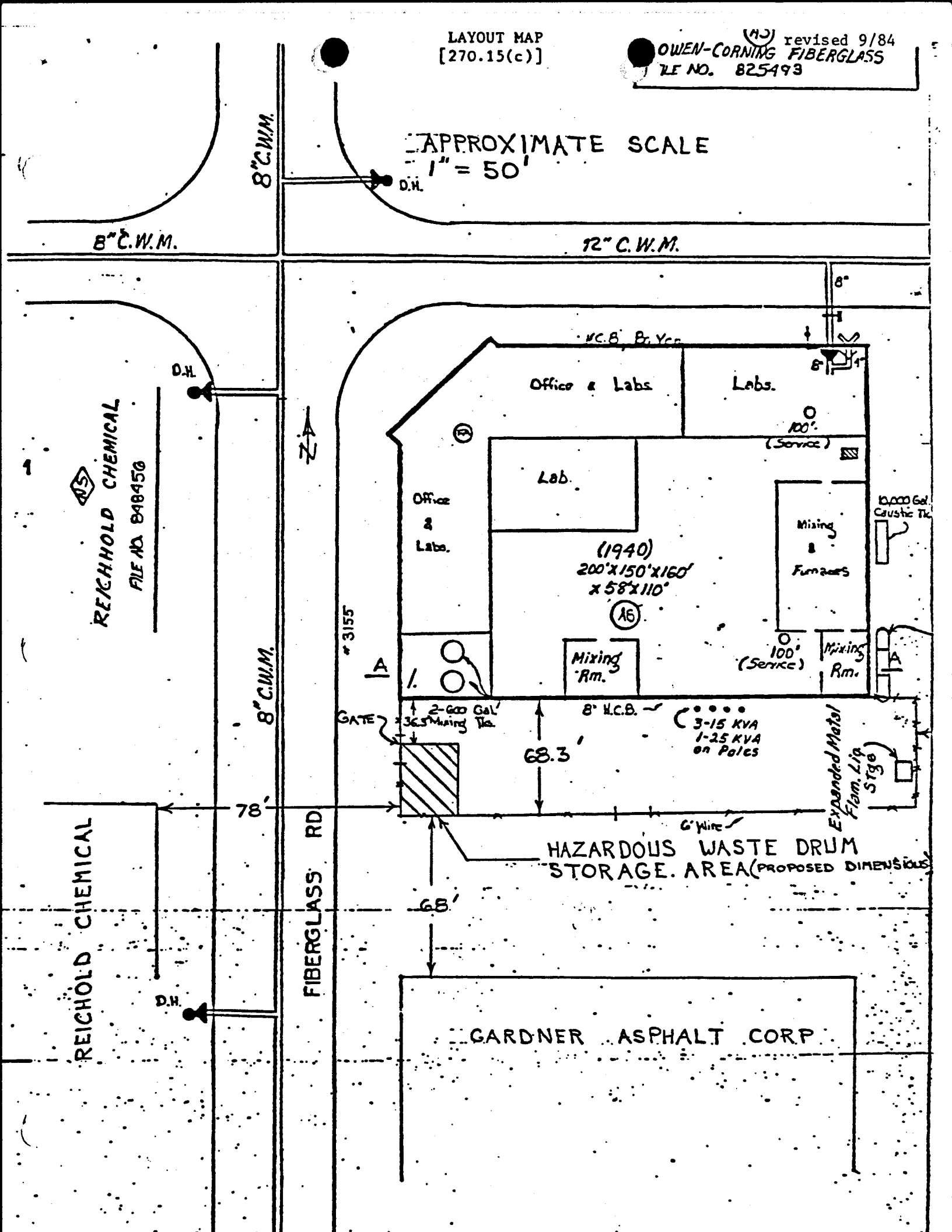
RECEIVED
JAN 10 1983
M. W. PELLEY

LAYOUT MAP
[270.15(c)]

revised 9/84

OWEN-CORNING FIBERGLASS
LE NO. 825493

APPROXIMATE SCALE
1" = 50'



CITY OF KANSAS CITY, KANSAS

FIRE DEPARTMENT

IN REPLY REFER TO
LAWRENCE D. BOWERS, CHIEF

JOHN E. REARDON, MAYOR

August 7, 1984

Mr. Glen D. Jenkins
Plant Manager
Olin Corporation
3155 Fiberglass
Kansas City, KS

Dear Mr. Jenkins:

After reviewing the drawing of your companies by-product area, it is the recommendation of this Department that the by-product produced in your manufacturing company are flammable and combustible.

You may be allowed forty (40) barrels each in storing your liquids and solids that are flammable and combustible in order to separate in between, you should store your aqueous barrels.

The storage area should be of cinder blocks on three sides, open top, catch basin, and portable sump pump that will pump spilled produce back into a container.

Sincerely,

Fred L. Brown
Assistant Fire Marshal
K. C. K. F. D.

FLB/tl

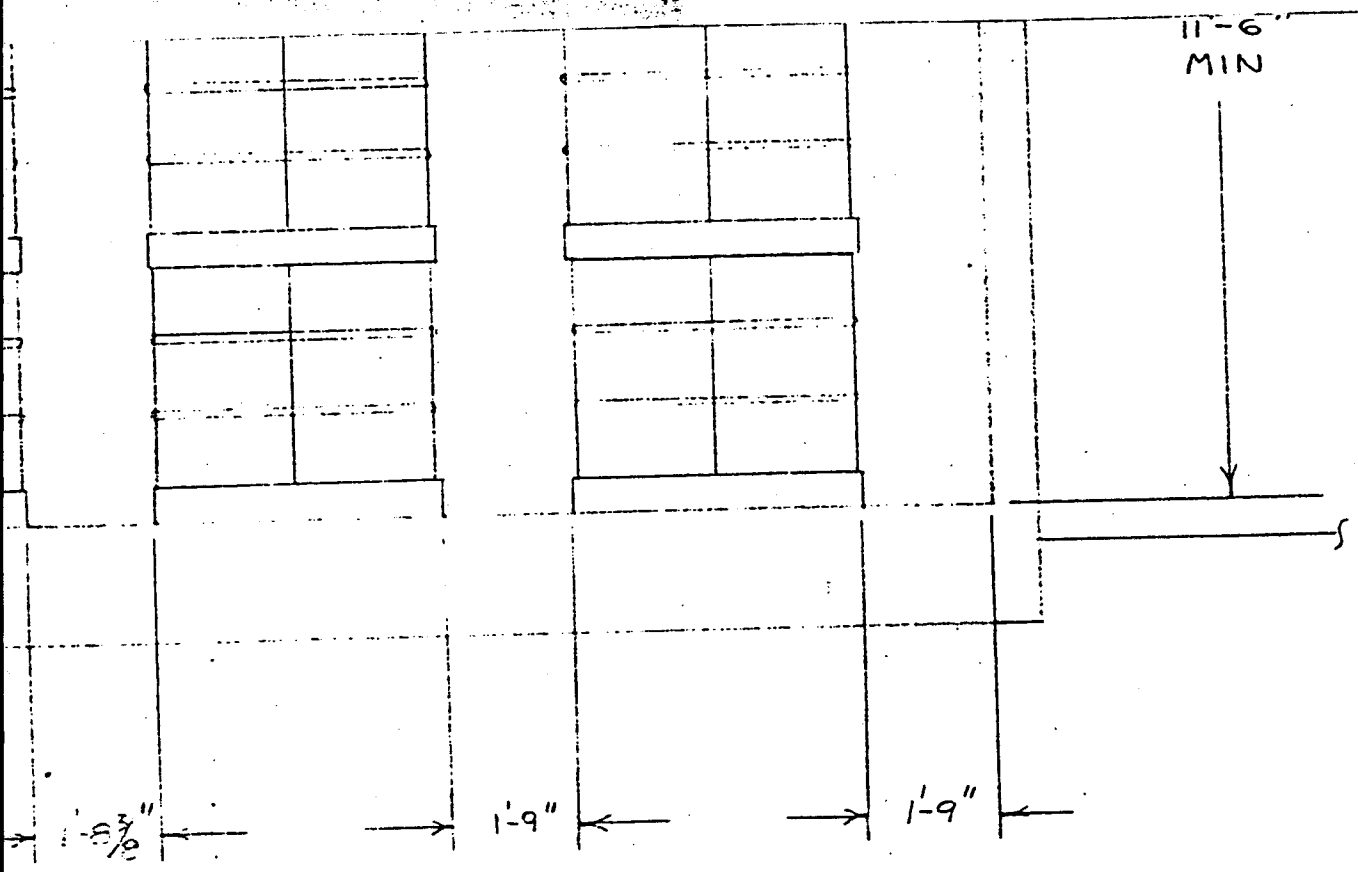
270.15(d): Where incompatible wastes are stored or otherwise managed in containers, a description of the procedures used to ensure compliance with Subsections 264.177(a) and (b), and 264.17(b) and (c).

I. Sections 264.177(a) and (b): Incompatible wastes, or incompatible wastes and materials, will never be placed into the same container. Each container will be dedicated to a single waste. In addition, containers will not, under any forseeable circumstances, be reused for waste storage; if ever a container were to be so reused, it would be triple rinsed with a suitable solvent prior to being loaded with any waste not compatible with the prior contents. Likewise, containers will be appropriately triple rinsed prior to initial service for hazardous waste storage if incompatibility of residue is of concern.

II. Sections 264.17(b) and (c): See Section 270.14(b)(9).

270.5(c) Waste Segregation D[illegible]am

See Part B



-A

OLIN WATER SERVICES		
SCALE: 3/8" = 1'-0"	APPROVED BY:	DRAWN BY ZDQ
DATE: 9/10/84		REVISED
KC WASTE SEGREGATION DIAGRAM		DRAWING NUMBER A-122